

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Defense Distributed,
Second Amendment Foundation, Inc.,
Firearms Policy Coalition, Inc.,
Firearms Policy Foundation,
Calguns Foundation,
California Association of Federal
Firearms Licensees, and
Brandon Combs,

Plaintiffs,

v.

Gurbir Grewal, Attorney General of the
State of New Jersey,
Defendant.

Civil Action No. _____

**PLAINTIFFS' PROPOSED ORDER
GRANTING PRELIMINARY INJUNCTION**

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**Pro hac vice* motions to be filed

Counsel for Plaintiffs

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ORDER GRANTING PRELIMINARY INJUNCTION

This matter having been presented to the Court upon the application of Plaintiffs, by and through their counsel, Hartman & Winnicki, P.C. and Beck Redden LLP (pro hac vice to be filed), for a preliminary injunction pursuant to Federal Rule Civil Procedure 65; and the Court having considered the verified complaint, the affidavits and other evidence, the brief in support of Plaintiff's motion, and the arguments of counsel; the Court has determined that Plaintiffs are very likely to succeed on the merits of their claims, that Plaintiffs will suffer irreparable harm without immediate injunctive relief, that the balance of harms weighs heavily in Plaintiffs' favor, that granting this relief is in the public interest, and that Plaintiffs

application for a preliminary injunction should be granted. Therefore, on this ____ day of _____ 2019, the Court GRANTS the motion and ORDERS as follows:

1. New Jersey Attorney General Gurbir Grewal is enjoined from enforcing New Jersey Statute 2C:39-9(l)(2) against Plaintiffs.
2. New Jersey Attorney General Gurbir Grewal is enjoined from directing the Plaintiffs to cease and desist publishing computer files with digital firearms information.
3. New Jersey Attorney General Gurbir Grewal is enjoined from directing Plaintiffs' communication service providers to cease and desist publishing Plaintiffs' computer files with digital firearms information.
4. This order applies against anyone that both receives actual notice of it by personal service or otherwise and is either (1) an officer, agent, servant, employee, or attorney of New Jersey Attorney General Gurbir Grewal, or (2) in active concert or participation with Attorney General Gurbir Grewal. No security is required.
5. This order takes effect immediately and shall remain in effect for the pendency of this litigation or until further action from this Court.

Dated: _____

United States District Judge